

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

SABEIN BURGESS,

*

Plaintiff,

*

v.

*

Civil Action No.: RDB-15-0834

BALTIMORE

*

POLICE DEPARTMENT *et al.*,

*

Defendants.

*

* * * * *

**PLAINTIFF’S MOTION *IN LIMINE* NO. 21 TO BAR ANY
APPEAL TO JURORS’ INTERESTS AS TAXPAYERS
OR ANY OTHER APPEAL TO THEIR PECUNIARY INTERESTS**

Now comes Plaintiff, Sabein Burgess, by and through his counsel, Loevy & Loevy, and respectfully moves this Court for an order barring any reference to jurors’ pecuniary interests or interests as taxpayers. In support thereof, Plaintiff states as follows:

The Fourth Circuit has long held that arguments that play on jurors’ pecuniary interests or appeal to their interests as taxpayers are unquestionably unacceptable. *United States v. Blecker*, 657 F.2d 629, 636 (4th Cir. 1981) (“We recognize that appeals to the pecuniary interests of jurors are patently improper.”). Defendants should be barred from suggesting to jurors or questioning any witness in any manner that suggests that the jury should consider its pecuniary interests in deciding the case or the effect of a verdict on them as taxpayers.

WHEREFORE, for the foregoing reasons, Plaintiff respectfully moves this Court for an order barring any reference to jurors’ pecuniary interests.

RESPECTFULLY SUBMITTED,

SABEIN BURGESS

/s/ Jon Loevy

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CERTIFICATE OF SERVICE

I, Jon Loevy, an attorney, hereby certify that on October 20, 2017, I filed the foregoing motion using the Court's CM/ECF system, which effected service on all counsel of record.

RESPECTFULLY SUBMITTED,

/s/ Jon Loevy

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